

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN SULLIVAN, WHITE OAK FUND LP,
CALIFORNIA STATE TEACHERS'
RETIREMENT SYSTEM, SONTERRA CAPITAL
MASTER FUND, LTD., FRONTPOINT
PARTNERS TRADING FUND, L.P., AND
FRONTPOINT AUSTRALIAN OPPORTUNITIES
TRUST on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

BARCLAYS PLC, BARCLAYS BANK PLC,
BARCLAYS CAPITAL INC., BNP PARIBAS S.A.,
CITIGROUP, INC., CITIBANK, N.A.,
COÖPERATIEVE CENTRALE RAIFFEISEN-
BOERENLEENBANK B.A., CRÉDIT AGRICOLE
S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE
BANK AG, DB GROUP SERVICES UK
LIMITED, HSBC HOLDINGS PLC, HSBC BANK
PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P.
MORGAN CHASE & CO., JPMORGAN CHASE
BANK, N.A., THE ROYAL BANK OF
SCOTLAND PLC, SOCIÉTÉ GÉNÉRALE SA,
UBS AG AND JOHN DOE NOS. 1-50,

Defendants.

No. 13-cv-02811 (PKC)

ORAL ARGUMENT REQUESTED

**NOTICE OF DEFENDANTS' MOTIONS TO
DISMISS THE FOURTH AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendants Citigroup, Inc., Citibank, N.A, Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A, Crédit Agricole S.A.,

Crédit Agricole CIB, Deutsche Bank AG, DB Group Services (UK) Ltd., HSBC Holdings plc, HSBC Bank plc, ICAP plc, ICAP Europe Limited, JPMorgan Chase & Co., JPMorgan Chase Bank, N.A., The Royal Bank of Scotland plc, Société Générale and UBS AG (collectively, the “Moving Defendants”), in the above-captioned matter, will move this Court, before the Honorable P. Kevin Castel, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined by this Court, for an order pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice the Fourth Amended Class Action Complaint in the above-captioned action.

The grounds for these motions are that the Fourth Amended Class Action Complaint should be dismissed for lack of personal jurisdiction as to Coöperatieve Centrale Raiffeisen-Boerenleenbank B.A., Crédit Agricole S.A., Crédit Agricole CIB, Deutsche Bank AG, DB Group Services (UK) Ltd., HSBC Holdings plc, HSBC Bank plc, ICAP plc, ICAP Europe Limited, The Royal Bank of Scotland plc, Société Générale and UBS AG (collectively, the “Foreign Defendants”), and because, as to all Moving Defendants, it fails to state a claim upon which relief can be granted and the Court lacks subject matter jurisdiction over the claims asserted. The specific grounds are set forth in two memoranda: (1) the Memorandum of Law in Support of Defendants’ Motion to Dismiss for Lack of Subject Matter Jurisdiction and Failure to State a Claim and the accompanying Declaration of Andrew C. Finch dated October 14, 2015 and exhibits thereto; and (2) the Memorandum of Law in Support of Foreign Defendants’ Motion to Dismiss for Lack of Personal Jurisdiction and the accompanying Declarations of Pierre Minor, Oliver Chazareix, Andrew Sherman, Allison Cambria, Joseph P. Randazzo, Joanne Bagshaw, Mark Chambers, Tim Brown, Gavin A. Francis, David Ireland, Andrew Berry, William Gougherty, Dominique Bourrinet, and Richard Mumford.

Dated: New York, New York
October 14, 2015

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